



Your business  
is our business.

REDACTED – FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200  
Greenbelt, Maryland 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: [www.jsitel.com](http://www.jsitel.com), e-mail: [jsi@jsitel.com](mailto:jsi@jsitel.com)

June 30, 2015

**Via Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2015 ETC Annual Report of Bluffton Telephone Company  
Study Area Code 240512**

Dear Ms. Dortch:

On behalf of Bluffton Telephone Company (“Bluffton”), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission’s rules.<sup>1</sup> Bluffton seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is also being filed this date via the FCC’s Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).<sup>3</sup>

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

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<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 15-712 rel. June 17, 2015 (Protective Order). 47 C.F.R. § 54.313(f)(2).

<sup>3</sup> 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).



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June 30, 2015

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2015 ETC Annual Report of Bluffton Telephone Company  
Study Area Code 240512  
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Bluffton Telephone Company (the “Company”) hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,<sup>1</sup> withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).<sup>2</sup>

1. The information for which the Company is seeking confidential treatment is an attachment to the Company’s annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).<sup>3</sup>
2. Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan (“Five-Year Plan”) which is contained in the attachment to the 2015 Report.<sup>4</sup>
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

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<sup>1</sup> 47 C.F.R. §§ 0.457, 0.459.

<sup>2</sup> 47 C.F.R. § 0.459(b)(1) through (9).

<sup>3</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>4</sup> See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."<sup>5</sup> Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has

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<sup>5</sup> See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,

A handwritten signature in black ink, appearing to read "John Kuykendall". The signature is fluid and cursive, with the first name "John" and last name "Kuykendall" clearly distinguishable.

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**

REDACTED FOR PUBLIC INSPECTION

 FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	240512
<015>	Study Area Name	BLUFFTON TEL. CO.
<020>	Program Year	2016
<030>	Contact Name: Person USAC should contact with questions about this data	Cissy Zareva
<035>	Contact Telephone Number: Number of the person identified in data line <030>	8436861256 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	cissy.zareva@htc.hargray.com

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
(check box when complete)			
<100>	Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>
<200>	Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>
<210>	<input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>
<300>	Unfulfilled Service Requests (voice)	0	
<310>	Detail on Attempts (voice)		
		(attach descriptive document)	
<320>	Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>
<330>	Detail on Attempts (broadband)		
		(attach descriptive document)	
<400>	Number of Complaints per 1,000 customers (voice)		
<410>	Fixed	0.0	<input checked="" type="checkbox"/>
<420>	Mobile	0.0	<input checked="" type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>
<440>	Fixed	0.0	
<450>	Mobile	0.0	
<500>	Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>
<510>	240512SC510.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>
<600>	Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>
<610>	240512SC610.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>
<700>	Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>
<710>	Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>
<800>	Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>
<1000>	Voice Services Rate Comparability Certification	Yes	<input checked="" type="checkbox"/>
<1010>	240512SC1010.pdf	(attach descriptive document)	
<1100>	Certify whether terrestrial backhaul options exist (Yes or No)	(if not, check to indicate certification)	<input checked="" type="checkbox"/>
<1110>		(complete attached worksheet)	
<1200>	Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

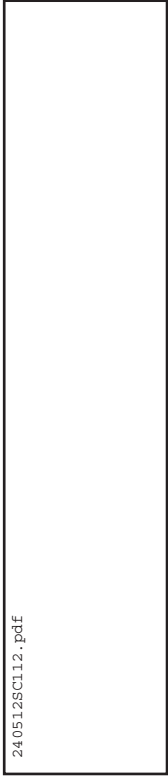
<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>

<b>(100) Service Quality Improvement Reporting Data Collection Form</b>		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	240512
<015>	Study Area Name	BLUFFTON TEL. CO.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Cissy Zareva
<035>	Contact Telephone Number - Number of person identified in data line <030>	8436861256 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargray.com
<110>	Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing "5 year plan" filed with the FCC?	<div> <input type="radio"/> (yes)                 <input checked="" type="radio"/> (no)             </div> <div> <input type="radio"/> (yes)                 <input type="radio"/> (no)             </div>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.



Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	Yes
<114>	Report how much universal service (USF) support was received	Yes
<115>	How much (USF) was used to improve service quality and how support was used to improve service quality	Yes
<116>	How much (USF) was used to improve service coverage and how support was used to improve service coverage	Yes
<117>	How much (USF) was used to improve service capacity and how support was used to improve service capacity	Yes
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	Not Applicable

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

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cissy.zareva@htc.harqray.com

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

1/1/2015	
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1/1/2015	
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-- See attached worksheet

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

[illegible]

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

[illegible]

(900) Tribal Lands Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	240512
<015>	Study Area Name	BLUFFTON TEL. CO.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Cissy Zareva
<035>	Contact Telephone Number - Number of person identified in data line <030>	8436861256 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargray.com

<910>	Tribal Land(s) on which ETC Serves
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<920>	Tribal Government Engagement Obligation
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Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

<b>(1100) No Terrestrial Backhaul Reporting</b>		FCC Form 481
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	240512
<015>	Study Area Name	BLUFFTON TEL. CO.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Cissy Zareva
<035>	Contact Telephone Number - Number of person identified in data line <030>	8436861256 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargray.com

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

<b>(1200) Terms and Condition for Lifeline Customers</b>		FCC Form 481
<b>Lifeline</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
<b>Data Collection Form</b>		July 2013

<010>	Study Area Code	240512
<015>	Study Area Name	BLUFFTON TEL. CO.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Cissy Zareva
<035>	Contact Telephone Number - Number of person identified in data line <030>	8436861256 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hardgray.com

<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	<div>2405128C1210.pdf</div>	Name of Attached Document
<1220>	Link to Public Website	HTTP	

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

<b>(2000) Price Cap Carrier Additional Documentation</b>		FCC Form 481
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>		July 2013

<010>	Study Area Code	240512
<015>	Study Area Name	HOUSTON TEL. CO.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Cissy Zareva
<035>	Contact Telephone Number - Number of person identified in data line <030>	8436661256 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@tc.hargray.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1)i}
- <2011a> 3rd Year Certification {47 CFR § 54.313(b)(1)ii}
- <2011b> Attachment {47 CFR § 54.313(b)(1)ii}

Name of Attached Document(s) Listing Required Information

**Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}**

- <2012> 2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}
- <2013> 2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}
- <2014> 2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}
- <2015> 2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

- <2016> Certification Support Used to Build Broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification

<2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

Name of Attached Document(s) Listing Required Information

- <2021> Interim Progress Community Anchor Institutions

(3000) Rate Of Return Carrier Additional Documentation	
Data Collection Form	
FCC Form 481	
OMB Control No. 3060-0986/OMB Control No. 3060-0819	
July 2013	

<010>	Study Area Code	240512
<015>	Study Area Name	BLUEFTON TEL. CO.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Cissy Zareva
<035>	Contact Telephone Number - Number of person identified in data line <030>	8436861256 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargrav.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010)	Progress Report on 5 Year Plan	
	Milestone Certification (47 CFR § 54.313(f)(1)(ii))	

(3011)	Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<input checked="" type="checkbox"/>
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(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))	
	Name of Attached Document Listing Required Information	240512SC3010.pdf

(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))	<input checked="" type="checkbox"/>
(3014)	If yes, does your company file the RUS annual report	<input checked="" type="checkbox"/>

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<input type="checkbox"/>
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>

(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	
	Name of Attached Document Listing Required Information	

(3018)	If the response is no on line 3014, Is your company audited?	<input checked="" type="checkbox"/>
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If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications	<input checked="" type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input checked="" type="checkbox"/>
(3021)	Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit	<input checked="" type="checkbox"/>

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,	<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant	<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.	<input type="checkbox"/>
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>

(3026)	Attach the worksheet listing required information	
	Name of Attached Document Listing Required Information	240512SC3026.pdf

<010>	Study Area Code	240512
<015>	Study Area Name	BLUFFTON TEL. CO.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Cissy Zareva
<035>	Contact Telephone Number - Number of person identified in data line <030>	8436861256 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargray.com

Financial Data Summary	
(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant In Service(TPIS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	
(3034) Dividends	

<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	240512
<015>	Study Area Name	BLUFFTON TEL. CO.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Cissy Zareva
<035>	Contact Telephone Number - Number of person identified in data line <030>	8436861256 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargray.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: BLUFFTON TEL. CO.	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/29/2015
Printed name of Authorized Officer: David Armistead	
Title or position of Authorized Officer: General Counsel	
Telephone number of Authorized Officer: 8436861275 ext.	
Study Area Code of Reporting Carrier: 240512	Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<b>Certification - Agent / Carrier</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	240512
<015> Study Area Name	BLUFFTON TEL. CO.
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Cissy Zareva
<035> Contact Telephone Number - Number of person identified in data line <030>	8436861256 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargray.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 112**

**Five-Year Network Improvement Plan and  
Progress Report**

**ATTACHMENT REDACTED IN ENTIRETY**

**Bluffton Telephone Company, Inc.’s demonstration of complying with applicable service quality standards and consumer protection rules for voice and broadband services:**

In establishing this certification in its *2005 ETC Order*,<sup>1</sup> the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”<sup>2</sup> The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement and that the sufficiency of other commitments would be considered on a case-by-case basis.<sup>3</sup> In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”<sup>4</sup>

Bluffton Telephone Company, Inc. (“Bluffton”) hereby certifies that it is in compliance with applicable service quality standards and consumer protection rules. Bluffton is subject to consumer protection obligations under both federal and South Carolina state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the Public Service Commission of South Carolina which disclose rates, and terms and conditions of service to customers (Section 103-612.2.1 of the South Carolina Code of Regulations); (2) adherence to state consumer protection requirements governing telephone providers which govern Standards and Quality of Service (Sections 103-661, 103-662, and 103-663 of the South Carolina Code of Regulations); Customer Relations,

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<sup>1</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

<sup>2</sup> *Id.* at para. 28.

<sup>3</sup> *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

<sup>4</sup> *Id.* at n. 72.

including billing, deposits, discontinuance and termination of service (Sections 103-620 through 103-633 of the South Carolina Code of Regulations); Engineering and Safety Standards (Sections 103-640 through 103-646 and 103-670 through 103-672 of the South Carolina Code of Regulations); Inspections and Tests (Sections 103-650 through 103-653 of the South Carolina Code of Regulations); Records and Reports (Sections 103-610 through 103-619 of the South Carolina Code of Regulations) and Customer Complaints (Section 103-628 of the South Carolina Code of Regulations); (3) truth-in-billing requirements (Section 103-622.1 of the South Carolina Code of Regulations); and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

Bluffton is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in 47 CFR § 8.3.

**Bluffton Telephone Company's demonstration of ability to function in emergency situations for voice and broadband services:**

Bluffton Telephone Company, Inc. ("Bluffton") hereby certifies that it is able to function in emergency situations as set forth in 47 C.F.R. § 54.202(a)(2)<sup>1</sup> and Section 103-646 of the South Carolina Code of Regulations. Bluffton's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2) and Section 103-646 of the South Carolina Code of Regulations. Bluffton can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow Bluffton to manage traffic spikes throughout its network, as emergency situations require. In addition, Bluffton has redundancy for connectivity purposes *via* additional routes and electronic equipment for voice and broadband services.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. Bluffton has battery backup at all office locations and in its electronic equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are installed at all Central Office locations. They will continue to run as long as Bluffton has access to fuel.

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<sup>1</sup> Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

REDACTED FOR PUBLIC INSPECTION

(700) Price Offerings including Voice Rate Data  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	24 05 12
<015>	Study Area Name	BLUFFTON TEL. CO.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Cissy Zareva
<035>	Contact Telephone Number - Number of person identified in data line <030>	8436861256 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@tc.hargray.com

	Residential Local Service Charge Effective Date	1/1/2015
<701>	Residential Local Service Charge	
<702>	Single State-wide Residential Local Service Charge	

[illegible]



(800) Operating Companies  
Data Collection Form

<010>	Study Area Code	240512
<015>	Study Area Name	BLUFFTON TEL. CO.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Cissy Zareva
<035>	Contact Telephone Number - Number of person identified in data line <030>	8436861256 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cissy.zareva@htc.hargray.com
<810>	Reporting Carrier	Bluffton Telephone Company, Inc.
<811>	Holding Company	Hargray Communications Group, Inc.
<812>	Operating Company	Bluffton Telephone Company, Inc.

[illegible]

Statement Regarding Certification of Voice Rate Comparability  
Line 1010

Bluffton Telephone Company, Inc. (BTC) is a rural, rate of return regulated incumbent local exchange carrier operating in the state of South Carolina, and is an eligible telecommunications carrier (ETC) designated by the South Carolina Public Service Commission.

BTC hereby certifies that the pricing of its voice services is no more than two standard deviations above the national average urban rate for voice service, \$47.48, as specified in the April 16, 2015, Public Notice issued by the Wireline Competition Bureau of the Federal Communications Commission.

BTC Local Service Rates including the SC state USF fee and mandatory EAS are as follows:

Limited Local Service	\$17.59
Basic Local Service	\$24.89
Average Local Svc Rate	\$21.24

### South Carolina Lifeline

Under the Lifeline program, telephone customers who participate in Medicaid (Healthy Connections), Food Stamps (SNAP), Temporary Assistance for Needy Families (TANF), School Free Lunch, Section 8, Supplemental Security Income (SSI), or Low Income Home Energy Assistance Program (LIHEAP) are entitled to receive a discount up to \$12.75 per month on their telephone service. If you are a telephone customer that does not participate in any of these programs but your total household income is at or below 135% of Federal Poverty Guidelines, you may be eligible to receive the Lifeline benefit. Hargray is eligible to provide the Lifeline benefit to qualifying residential telephone customers in Hilton Head, Hardeeville and Bluffton.

Lifeline is a government supported service. Applicants will be required to provide documentation necessary to verify eligibility. Applicants who willfully make false statements in order to obtain Lifeline benefits can be punished by fine or barred from the program. Only ONE Lifeline benefit per household. A household is not permitted to receive Lifeline benefits from multiple providers.

## GENERAL CUSTOMER SERVICES TARIFF

BLUFFTON TELEPHONE COMPANY, INC.  
BLUFFTON, S.C.  
REVISED: APRIL 2, 2012

SECTION 3  
1<sup>st</sup> Revised Page 12  
Cancels Original Page 12

## S3. BASIC LOCAL EXCHANGE SERVICE

S3.10 Lifeline Program

(C)

S3.10.1 General

- A. The Lifeline program is designed to increase the availability of telecommunications services to low income subscribers by providing a credit to monthly recurring local service for qualifying residential subscribers.
- B. Lifeline is provided under the federal universal service support mechanism as a federal benefit.
- C. Lifeline is mandated by the Federal Communications Commission.

S3.10.2 Regulations and Rates

Regulations and Rates shall be concurrent with those mandated by the FCC and The Public Service Commission of South Carolina.

(C)

S3.10.3 Eligibility and Certification

Eligibility and Certification shall be concurrent with the requirements of the FCC and The Public Service Commission of South Carolina.

## GENERAL CUSTOMER SERVICES TARIFF

BLUFFTON TELEPHONE COMPANY, INC.  
 BLUFFTON, S.C.  
 EFFECTIVE: July 1, 2014

SECTION 3  
 13<sup>th</sup> Revised Page 1  
 Cancels 12<sup>th</sup> Revised Page 1

## S3. LOCAL EXCHANGE SERVICE

## S3.1 General

3.1.1 Local exchange service rates in this tariff are as identified with the Bluffton Telephone Co., Inc. of Bluffton, South Carolina.

## 3.1.2 Extended Area Service (EAS)

a. Implemented pursuant to South Carolina Public Service Commission Order No. 2007-346

b. Expands local calling to include the following exchange areas:

Beaufort, SC	Bluffton, SC
Hardeeville, SC	Ridgeland, SC
Hilton Head Island, SC	Savannah, GA
Laurel Bay, SC	St. Helena, SC
Pooler, GA	Tybee Island, GA

c. Monthly recurring charge per line of:

\$2.28/Residential

\$4.56/Business

(I)

## 3.1.3 Local Exchange Service Offerings

a. **Limited Local Service** allows voice calls to the areas identified in 3.1.2(b) preceding.

Voice calls made outside of those listed in 3.1.2(b) preceding, are subject to additional charges.

b. **Basic Local Service** allows calls to any location within the United States and its Territories including but not limited to Alaska, Hawaii, U.S. Virgin Islands, Puerto Rico, Northern Antilles and Guam.

Applies to residential lines only and not offered in conjunction with business lines.

Intended for normal voice usage equal to, or less than 3,600 usage minutes per month excluding usage minutes for calls placed to any area listed in 3.1.2(b) preceding.

In the event monthly usage exceeds 3,600 minutes per month, local measured service charges apply at \$0.01 per minute for each minute in excess of 3,600 minutes

(T)

3.1.4 Rates for service and equipment not specifically shown in this section are presented in other sections of this tariff.

REDACTED FOR PUBLIC INSPECTION

## GENERAL CUSTOMER SERVICES TARIFF

BLUFFTON TELEPHONE COMPANY, INC.  
BLUFFTON, S.C.  
EFFECTIVE: July 1, 2014

SECTION 3  
3rd Revised Page 1.1  
Cancels 2nd Page 1.1

## S3. LOCAL EXCHANGE SERVICE

## S3.2 Monthly Exchange Rates

3.2.1 Monthly exchange rates are authorized by the Public Service Commission of South Carolina as shown below.

## 3.2.2 Limited Local Service as identified in 3.1.3(a) preceding

	<u>Monthly Rate</u>	
a. Residential		
Each Single	\$ 14.85	(I)
EAS	<u>\$ 2.28</u>	
Base Charge	\$ 17.13	
b. Business		
Each Single Line, Key Trunk, PBX Trunk or Paystation	\$ 29.69	(I)
EAS	<u>\$ 4.56</u>	
Base Charge	\$ 34.25	

## 3.2.3 Basic Local Service as defined in Section 3.1.3(b) preceding

a. Residential Single Line	\$ 21.97	(I)
EAS	<u>\$ 2.28</u>	
Base Charge	\$ 24.25	



# South Carolina Lifeline Assistance Application

**Step 1:** Applicant Information *(fill in each block entirely)*

Your Hargray Phone #	First Name	MI	Last Name
<b>Address Where Service Is Located</b> (No PO Boxes)			City & State
Is this your permanent address? (circle one) <div style="display: flex; justify-content: space-around;"> <span>YES</span> <span>NO</span> </div>			Zip Code
<b>Billing Address, City, State &amp; Zip Code (If different from Service Address)</b> (PO Boxes Allowed)			
Last 4 Digits of Social Security Number		Date of Birth	

**Step 2:** Determine whether you qualify for lifeline based on participation in the eligible programs of section A, or because you meet the income eligibility requirements of section B.

## Section A

PROGRAM ELIGIBILITY: *check the following program(s) in which you, **or** a member of your household, currently participate. Please attach a copy of eligibility documentation. If the program participant is not you, but a member of your household, please print the name of the program participant here:*

	Federal Public Housing Assistance (FPHA) or Section 8	Supplemental Security Income (SSI)
	National School Lunch Program – Free Lunch Program	Medicaid
	Low Income Home Energy Assistance Program (LIHEAP)	Temporary Assistance for Needy Families (TANF)
	Supplemental Nutrition Assistance Program (SNAP) <i>formerly known as food stamps</i>	

## Section B

**INCOME ELIGIBILITY GUIDELINES:** If you do not participate in any of the programs above, you may still be eligible for Lifeline Assistance if your annual household income is at or below the amounts shown below (135% of FPG) depending on the size of your household. PLACE A CHECK next to the total number of people in your household. Please indicate the number of household members if more than 8.

Persons in family/household	2015 Poverty Guidelines – 135%
1 _____	\$15,889
2 _____	\$21,505
3 _____	\$27,121
4 _____	\$32,737
5 _____	\$38,353
6 _____	\$43,969
7 _____	\$49,585
8 _____	\$55,201
For families/households with more than 8 persons, add \$5,616 for each additional person:	

**PLEASE COMPLETE NEXT PAGE. BOTH PAGES OF THIS APPLICATION ARE REQUIRED IN ORDER TO PROCESS YOUR APPLICATION. PLEASE INCLUDE YOUR ELIGIBILITY DOCUMENTATION WITH YOUR APPLICATION.**

REDACTED FOR PUBLIC INSPECTION

## South Carolina Lifeline Assistance Application

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### IT IS IMPORTANT FOR YOU TO KNOW:

- Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program
- Only one Lifeline service is available per household
- A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses
- A household is not permitted to receive Lifeline benefits from multiple providers
- Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's (or "FCC") rules and will result in the subscriber's de-enrollment from the program
- Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person

### WE CANNOT PROCESS YOUR APPLICATION WITHOUT YOUR CERTIFICATION:

#### Certification

I certify, under penalty of perjury, that:

- I meet the income-based or program-based eligibility criteria for receiving Lifeline, shown above.
- I will notify the carrier within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, (a) if I no longer meet the income-based or program-based criteria for receiving Lifeline support; (b) I am receiving more than one Lifeline benefit, (c) or another member of my household is receiving a Lifeline benefit.
- If I move to a new address, I will provide that new address to Hargray within 30 days.
- My household will receive only one Lifeline service and, to the best of my knowledge, my household is not already receiving a Lifeline service.
- The information contained in this certification form is true and correct to the best of my knowledge.
- I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- I acknowledge that I may be required to re-certify my continued eligibility for Lifeline at any time, and my failure to re-certify my continued eligibility will result in de-enrollment and the termination of my Lifeline benefits.

I hereby authorize Hargray to release any of my information contained in this Lifeline Application required for the administration of the Lifeline program to the FCC or its designee, including the Universal Service Administrative Company, and to any state and federal agency, as required by law.

Applicant's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

CONFIDENTIAL  
NOT FOR PUBLIC INSPECTION

Bluffton Telephone Company, Inc.

### **Section 3010-Milestone Certification**

Pursuant to Section 54.313(f)(1)(i) Bluffton Telephone Company, Inc. certifies that it has taken reasonable steps to provide upon reasonable request broadband service at actual speeds of 4 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, and that requests for such service are met within a reasonable amount of time.

**CONFIDENTIAL**  
**NOT FOR PUBLIC INSPECTION**

Five-Year Plan and Progress Report  
Bluffton Telephone Company, Inc.  
SAC: 240512

## **Section 3012**

Bluffton Telephone can provide broadband service to all community anchor institutions in its service territory. It did not provide broadband service to any new community anchor institutions in 2014-2015.

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 3026**

**ATTACHMENT REDACTED IN ENTIRETY**